

LANDMAN CORSI BALLAINE & FORD P.C.

ATTORNEYS AT LAW

DAVID M. MURDZA
ASSOCIATE
TEL: (215) 561-8540
EMAIL: dmurdza@lcbf.com

ONE PENN CENTER
1617 JFK BOULEVARD, SUITE 955
PHILADELPHIA, PA 19103
TELEPHONE (215) 561-8540
FACSIMILE (215) 988-1215
www.lcbf.com

120 Broadway
27th Floor
New York, New York 10271
Tel: (212) 238-4800

One Gateway Center
4th Floor
Newark, NJ 07102
Tel: (973) 623-2700

January 17, 2018

VIA ECF FILING ONLY

Honorable Cathy L. Waldor, U.S.M.J.
United States District Court
District of New Jersey
Martin Luther King Building & U.S. Courthouse
50 Walnut Street
Newark, New Jersey 07101

So ordered
AW
1/22

Re: Anthony Sessa v. National Railroad Passenger Corporation ("Amtrak")
Civil Action No. 17-4512, District of New Jersey

Dear Judge Waldor:

This office represents defendant National Railroad Passenger Corporation ("Amtrak") in the above-referenced matter. Amtrak respectfully requests a 60-day extension of the remaining deadlines set forth in the Court's September 15, 2017 Scheduling Order (attached), to allow Amtrak sufficient time to complete discovery. Plaintiff consents to this request. Attached hereto is a proposed order reflecting the extension requested.

By way of background, on December 7, 2017, a status conference was held by the Court, during which the undersigned counsel advised that plaintiff's initial disclosures and responses to Amtrak's interrogatories and request for production of documents were overdue and had not yet been received. After follow up requests via email and letter, on January 8, 2018, Amtrak received plaintiff's initial disclosures. Plaintiff's discovery responses have not been received to date.

On January 16, 2018, the undersigned conferred with plaintiff's counsel regarding this letter request and was advised that plaintiff consents to the extension, and that he is in the process of completing his responses to Amtrak's discovery requests.

Accordingly, Amtrak respectfully requests a 60-day extension of the remaining deadlines, as set forth in the attached proposed order, to allow Amtrak sufficient time to receive plaintiff's discovery responses, complete any necessary depositions and adequately prepare its defense to plaintiff's allegations.

LANDMAN CORSI BALLAINE & FORD P.C.

Honorable Cathy L. Waldor, U.S.M.J.

January 17, 2018

Page 2

Thank you in advance for your consideration of this request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'DM', is written over the typed name.

David M. Murdza

DMM:mf

Enclosure

cc: James M. Duckworth, Esq. (w/encl.) (via email only)